

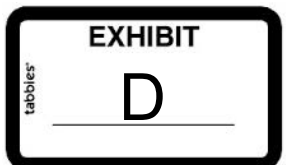
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DEJUAN SANDERS, Individually	§	
and On Behalf of All Others Similarly	§	
Situated,	§	
	§	
Plaintiff,	§	No. 5:16-CV-00890-XR-PAM
	§	
v.	§	
	§	JURY TRIAL DEMANDED
PACKERS SANITATION	§	
SERVICES, INC., LTD.,	§	
	§	
Defendant.	§	

DECLARATION OF SHERON LAWRENCE

My name is Sheron Lawrence. I am over the age of eighteen, of sound mind, and otherwise competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct. If called as a witness, I am competent to testify to these facts.

1. I currently live at 401 Marshall Rd., Logansport, Louisiana 71049.
2. I am a current employee of Packers Sanitation Services, Inc., Ltd. ("PSSI").
3. My first day of work for PSSI was in May 2014.
4. I am still currently employed at PSSI as of the date of this Declaration.
5. I have been employed by PSSI as a Sanitation Laborer.
6. My primary job duty is to manually clean and sanitize food plants, including the facility and the machines inside, which are operated by PSSI's



customers, to meet Quality Control and Bacterial Standards imposed by the customer and applicable to governmental agencies, such as the USDA.

7. During most of my employment with PSSI, my supervisor's name was Pedro Madrigal. As of March 2017, I have a new supervisor.

8. During my employment with PSSI, I have been a full-time employee working forty hours a week or more.

9. During my employment with PSSI, I was paid on an hourly basis. In other words, I received a fixed sum of money for each hour that I worked. My last rate of pay was approximately \$10.50 per hour.

10. Though I was sometimes paid for some overtime, I do not believe I was paid for all overtime that I worked. I frequently worked over 40 hours per week, yet not every paycheck reflects that time.

11. If I worked on a Saturday, I would only be paid for a half-day (4 hours), even if I worked more.

12. When I first started with PSSI, I would be required to sign a piece of blank printer paper to ensure that I was there for the day. The paper would not have any time documented on it; I assumed my manager input time after I signed. However, I was never given a record of my hours prior to receiving my paycheck.

13. I asked my supervisor, Pedro Madrigal, for a copy of my hours, but he would not give me one.

14. A few months after I started, in 2015, PSSI installed a facial recognition punch system. Frequently, I would be told either not to clock in or out

on the new system, or my manager would tell me that the system was down and we would have to sign in on a piece of paper like we had done before. Strangely, the system being down would depend on the day of the week, usually on the weekend, and work fine during the week.

15. Though I did not have a time card to compare my paycheck to, I would look at the hours for the week and know that I was short on hours and was not paid correctly.

16. My schedule was usually Monday through Friday, but about two Saturdays per month I would be scheduled. I rarely worked Sundays. I was scheduled from 11:00 PM to 8:00 AM, but would sometimes leave later than 8:00 AM. Whenever the Tyson plant was open, the facility we cleaned, we would be scheduled to work.

17. I typically worked between 45 to 54 hours per week but I was usually only paid between 40 to 45 hours.

18. There would typically be up to 80 workers on this night shift, 11:00 PM to 8:00 AM to complete the work.

19. Based on what I saw and my conversations with my coworkers, this pay practice applied to all hourly workers employed by PSSI. It did not depend on what we did or our position with PSSI.

20. Based on my experience talking with other employees I worked with in various locations, I believe that there would be others that would want to join this lawsuit if they were made aware of this suit and given an opportunity to join.

This declaration was read to me, word for word. I understood this declaration and confirm that it is true and correct, pursuant to 28 U.S.C. § 1746, under penalty of perjury of the laws of the United States of America.

03/21/2017

Date


Sheron Lawrence (Mar 21, 2017)

Sheron Lawrence
Declarant